

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

SPARTAN BUSINESS SOLUTIONS LLC
D/B/A SPARTAN CAPITAL,

Case No. 6:23-cv-06728-FPG

Plaintiffs,

-against-

NOTICE OF MOTION

MARQUIS CATTLE COMPANY INC.
D/B/A MARQUIS CATTLE COMPANY;
MONTANA MOUNTAIN BISON, INC.;
MCC TRUCKING LLC;
M HANGING 6 RANCH LLC D/B/ A PUMP'T;
MARQUIS CATTLE INC. and
CORY SHANNON MARQUIS,

Defendants.

PLEASE TAKE NOTICE that upon the Declaration of Steven W. Wells, Esq., dated January 19, 2024, with exhibits attached thereto, and the accompanying Memorandum of Law, dated January 19, 2024, Plaintiff Spartan Business Solutions LLC d/b/a Spartan Capital (“Plaintiff”), shall make an application pursuant to 28 U.S.C §§ 1332, 1441, 1446, and 1447, and 9 U.S.C. § 1, *et seq.*, for an order to remand against Defendants Marquis Cattle Company Inc. d/b/a Marquis Cattle Company, Montana Mountain Bison, Inc., MCC Trucking LLC, M Hanging 6 Ranch LLC d/b/a Pump’t, Marquis Cattle Inc., and Cory Shannon Marquis (“Defendants”), and for such other and further relief as the Court deems just and proper.

Dated: Lancaster, New York
January 19, 2024

Respectfully submitted,

WELLS LAW P.C.

By: /s/Steven W. Wells

Steven W. Wells

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Counsel for Plaintiff